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11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 SANDRA M. MEZA-PEREZ, an individual,

15 Plaintiff,

16 vs.

17 SBARRO LLC dba SBARRO PIZZA, a  
foreign limited liability company, SBARRO  
18 INC., dba SBARRO PIZZA a foreign  
corporation, ZACHARY CEBALLES, an  
19 individual, EFRAIN HERNANDEZ, an  
individual, JESUS ALATORRE, an  
20 individual,

21 Defendants.

CASE NO.: 2:19-cv-00373-APG-EJY

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
FILE REPLY BRIEFS IN SUPPORT OF  
HER POST-TRIAL MOTIONS  
[ECF NOS. 434-440]**

**(First Request)**

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23 Plaintiff SANDRA M. MEZA-PEREZ ("Plaintiff"), Defendants SBARRO LLC dba  
24 SBARRO PIZZA, and SBARRO, INC. dba SBARRO PIZZA, (collectively herein as

1 “Sbarro”), and Defendant ZACHARY CEBALLES (“Ceballes”), by and through their  
2 respective attorneys of record, stipulate as follows:

- 3 1. On October 4, 2022, Plaintiff filed the following post-trial motions:
  - 4 a. Renewal of Her Motions for Reconsideration and Clarification of This  
5 Court’s Prior Order on Summary Judgment Dismissing Her Claims for  
6 Negligent Hiring, Negligent Supervision and Negligent Retention [ECF No.  
7 434];
  - 8 b. Motion for New Trial Pursuant to FRCP 59(A) [ECF No. 435];
  - 9 c. Rule 50(b) Renewed Motion for Judgment as a Matter of Law [ECF No.  
10 436];
  - 11 d. Motion for Dispositive Sanctions Based Upon Sbarro and Ceballes’  
12 Spoliation of Evidence and Requesting Alternate Relief Under FRCP 50(B)  
13 for Judgment as a Matter of Law in Plaintiff’s Favor and/or a New Trial,  
14 Under FRCP 59(A) for a New Trial, and/or Under FRCP 60(B)(1) and (3)  
15 for Relief from the Judgment [ECF No. 437];
  - 16 e. Motion for Dispositive Sanctions Based Upon Sbarro and Ceballes’  
17 Spoliation of Evidence and Requesting Alternate Relief Under FRCP 50(b)  
18 for Judgment as a Matter of Law in Plaintiff’s Favor and/or a New Trial,  
19 Under FRCP 59(a) for a New Trial, and/or Under FRCP60(b)(1) and (3) for  
20 Relief from the Judgment [ECF No. 438];
  - 21 f. Motion for Dispositive Sanctions Based Upon Sbarro and Ceballes’  
22 Spoliation of Evidence and Requesting Alternate Relief Under FRCP 50(b)  
23 for Judgment as a Matter of Law in Plaintiff’s Favor and/or a New Trial,  
24 Under FRCP 59(a) for a New Trial, and/or Under FRCP60(b)(1) and (3) for  
Relief from the Judgment [ECF No. 439]; and
  - g. Motion for Dispositive Sanctions Based Upon Sbarro and Ceballes’  
Spoliation of Evidence and Requesting Alternate Relief Under FRCP 50(b)  
for Judgment as a Matter of Law in Plaintiff’s Favor and/or a New Trial,

1 Under FRCP 59(a) for a New Trial, and/or Under FRCP60(b)(1) and (3) for  
2 Relief from the Judgment [ECF No. 440].

3 2. On October 18, 2022, Sbarro filed the following responses to Plaintiff's post-trial  
4 motions:

5 a. Opposition to Plaintiff's Renewal of Her Motions for Reconsideration and  
6 Clarification of This Court's Prior Order on Summary Judgment Dismissing  
7 Her Claims for Negligent Hiring, Negligent Supervision and Negligent  
Retention [ECF No. 441];

8 b. Opposition to Plaintiff's Rule 50(b) Renewed Motion for Judgment as a  
9 Matter of Law [ECF No. 442];

10 c. Consolidated Opposition to Plaintiff's Motion for Dispositive Sanctions  
11 Based Upon Sbarro and Ceballes' Spoliation of Evidence and Requesting  
12 Alternate Relief Under FRCP 50(b) for Judgment as a Matter of Law in  
13 Plaintiff's Favor and/or a New Trial, Under FRCP 59(a) for a New Trial,  
14 and/or Under FRCP60(b)(1) and (3) for Relief from the Judgment [ECF No.  
443]; and

15 d. Opposition to Plaintiff's Motion for New Trial Pursuant to FRCP 59(A)  
[ECF No. 444].

16 3. On October 18, 2022, Ceballes joined each of Sbarro's responses to Plaintiff's  
17 post-trial motions [ECF Nos. 445-448].

18 4. Plaintiff's reply briefs in support of her post-trial motions are currently due to  
19 be filed by October 25, 2022.

20 5. The parties hereby stipulate and agree Plaintiff shall have until Monday, October  
21 31, 2022, to file her reply briefs in support of her post-trial motions.

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6. This is the first request for an extension of this deadline and is not made for purposes of undue delay.

Dated: October 25, 2022.

/s/ JENNY L. FOLEY  
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/s/ PATRICK N. CHAPIN  
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*Attorneys for Defendant  
ZACHARY CEBALLES*

ORDER

IT IS SO ORDERED:

  
UNITED STATES DISTRICT COURT JUDGE  
CASE NO.: 2:19-cv-00373-APG-EJY

DATED: October 26, 2022